



# Oregon

Theodore Kulongoski, Governor

## Department of Environmental Quality

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May 8, 2008

David Obern  
Portland Development Commission  
222 NW Fifth Avenue  
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Re: Conditional Further Action determination  
Lots 3 and 7, Station Place (aka Union-Station  
Horse Barn)  
ECSI #2407

Dave:

DEQ is pleased to conclude that remedial activities have been successfully completed at Lots 3 and 7 of the Station Place (aka Union Station-Horse Barn) site located at the northeast corner of NW Lovejoy Street and NW 9<sup>th</sup> Avenue in Portland, Oregon. Lots 3 and 7 are two of seven lots (1 through 5, 7, and 8) comprising the subject site. During investigation work begun in the late 1990s, extensive soil and groundwater contamination was found at the site associated with past railroad activities, and wastes from a manufactured gas plant that operated immediately south of the site in the late 1800s and early 1900s. Contaminants identified in the remedial investigation exceeding risk-based concentrations include metals and polynuclear aromatic hydrocarbons in soil, and benzene in groundwater.

The 2003 Record of Decision (ROD) for the Station Place site required the following:

- Capping of Lots 1 through 5, 7, and 8 with a combination of clean fill and hardscape materials such as asphalt and concrete;
- Installation of a vapor mitigation system below Lots 1 and 2, and periodic monitoring to confirm the effectiveness of the system;
- Periodic groundwater monitoring to confirm that a site-related groundwater plume is not expanding and/or threatening the Willamette River; and
- Placement of institutional controls on all site lots identifying the nature of residual contamination and requiring periodic inspection and maintenance of the cap and vapor mitigation systems.

Installation of the surface cap for Lot 7 was completed in 2003 concurrent with development of an at-grade paved parking lot over the entire lot. A closure report ("Lot 7 Closure Report") was submitted in August 2003 documenting installation of capping features consistent with the 2003 ROD and Remedial Action Work Plan (RAWP), and subsequently approved by DEQ. Capping of Lot 3 was completed in 2003 and 2004 concurrent with construction of a multi-story parking

garage on the lot. Capping elements include hardscaping (concrete and asphalt) over the majority of the lot, with a few small areas of landscaping adjoining the structure where soil capping was performed. A closure report ("Lot 3 Closure Report") was initially submitted to DEQ in December 2004. A revised (based on DEQ comment) report was subsequently submitted in 2005 and approved by DEQ. The PDC has retained ownership of both lots.

An Inspection and Maintenance Plan, Soil and Groundwater Management Plan, and Worker Notification and Protection Plan are included in the RAWP completed for the entire subject site in July 2003. As specified in the ROD and RAWP, periodic groundwater monitoring has been occurring at the site since 2003 to confirm that the nature and extent of contamination as documented at the time of the ROD has not changed in a manner that would require modification of the site remedy. Semi-annual events were completed in 2003 through 2005, and annual events in 2006 through 2008. There have been no significant changes noted in the nature and extent of on-site groundwater contamination as the result of the sampling. Groundwater contamination below the subject site consists largely of manufactured gas plant (MGP)-related contaminants, the most notable being benzene and naphthalene. High concentrations of volatile and semi-volatile organic compounds released off-site or in the southwest corner of the site show significant downgradient (east) attenuation, to the point that they are not detected in the Alluvial aquifer and are present in only one deeper Troutdale Gravel Aquifer (TGA) well at the east property boundary. Contamination is most significant below Lots 1 and 2, with lesser concentrations below Lot 3. No significant groundwater contamination has been identified beneath Lot 7.

As stipulated in the ROD, deed restriction (Easement and Equitable Servitude or EES) documents have been filed with Multnomah County for Lots 3 and 7. The documents were recorded on February 1, 2008, and outline the nature of remaining contamination, cap construction, and responsibilities of the property owner regarding inspection and maintenance of site engineering controls.

DEQ has determined that no further action is required for Lots 3 and 7 under Oregon Environmental Cleanup Law, ORS 465.200 et seq. unless additional information becomes available in the future which warrants further investigation. Public notice of DEQ's proposed NFA determination was published in December 1, 2005, and a 30-day comment period provided. No comment was received.

DEQ's no further action (NFA) determination is contingent upon maintenance engineered covers (caps) on the respective lots. The documents recorded with the property deeds explain items including cap maintenance and reporting requirements, DEQ's right of entry, and DEQ notification requirements in the event that site ownership or zoning/use changes. Yearly inspection and reporting are required for the foreseeable future unless DEQ determines in its five-year review that less frequent monitoring is necessary.

DEQ's Environmental Cleanup Site Information (ECSI) database has been updated to reflect the NFA decision. Note that the NFA is identified as conditional as engineering and institutional

controls are necessary for the remedy to remain effective. The site will remain on DEQ's Confirmed Release List and Inventory of Hazardous Substance Sites for the same reason.

If you have any questions, please contact Daniel Hafley at 229-5417. Thank you for your participation in the Voluntary Cleanup Program.

Sincerely,

Keith Johnson  
Manager, Cleanup & Lower Willamette Section

cc: Dan Hafley, Northwest Cleanup Section, DEQ  
Mike Greenburg, Site Response Section, DEQ  
David Obern, PDC  
Steven Shain, PDC  
Bob Van Vickle, PDC  
Len Farr, AMEC